

COMMENTS ON INITIAL LIHP TRANSITION PLAN
City and County of San Francisco
(San Francisco Department of Public Health)
July 6, 2012

Page	Section	Current Text	Comment
2	STC 23.a.i. and 23.a.ii (Plan for Eligibility Determination and Pre-Enrollment)	DHCS will engage the LIHPs on the development of an eligibility redetermination process by issuing written instructions to the LIHPs to ensure statewide consistency in the transition of individuals enrolled in the LIHP to new coverage under Medicaid or the Exchange by December 31, 2013.	<p>We recommend instead: “DHCS will engage the LIHPs on the development of an eligibility determination process by issuing written instructions and client notification language (in all threshold languages spoken in that respective County and written for low-literacy audiences) to LIHPs to ensure statewide consistency in the transition. This will assure seamless transitions to new coverage under Medicaid or the Exchange by December 31, 2013.”</p> <p>We do not believe that the term “redetermination” is accurate given that participants will be determined eligible for either Medi-Cal or subsidized coverage through the Exchange, rather than being “re-determined” eligible for the LIHP.</p>
2	STC 23.a.i. and 23.a.ii (Plan for Eligibility Determination and Pre-Enrollment)	DHCS will work with local LIHPs to establish a plan for the collection of required data elements needed for a smooth transition. The plan will be streamlined and include a simplified and consistent process so LIHP enrollees will continue to have health coverage on January 1, 2014 under the ACA.	<p>We recommend instead: “DHCS will work with local LIHPs to establish a plan for the collection of required data elements needed for a smooth transition. The plan will be streamlined for both clients and counties operating LIHPs. The plan will include a simplified and consistent process for LIHP enrollees to maintain uninterrupted health coverage on January 1, 2014 under the ACA through the end of the enrollment period started under the LIHP. Determination of eligibility and pre-enrollment will not require additional information from clients unless necessary data are missing.</p> <p>The plan will also include a simplified process for county LIHP entities to provide the State the LIHP participant eligibility data required to assure this seamless transition. Eligibility determination and pre-enrollment for coverage under the ACA will minimize duplicative eligibility processing at the County level.”</p>
2	STC 23.a.i. and 23.a.ii (Communication of Eligibility for Medicaid and Exchange)	DHCS will develop and partner with local LIHPs and the Exchange on an outreach and communication strategy for the transition of LIHP enrollees to Medicaid or the Exchange.	We recommend stating that the partnership include other stakeholders such as public hospitals, community health centers, local plans, and social services agencies.

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4	STC 23.a.i. and 23.a.ii (Communication of Medi-Cal Managed Care Plan Assignment)	Each enrollee of the LIHP will receive a notice no sooner than 90 days prior to January 1, 2014. The notice will state the following information:	<p>We recommend clarification of DCHS's role and the information included to state: "Each enrollee of the LIHP will receive a notice from DHCS no sooner than 90 days prior to January 1, 2014."</p> <p>We recommend that another bullet be added to the to the notice stating: "The notice will inform enrollee that they are still enrolled in their local LIHP for health care until December 31, 2013."</p>
5	STC 23.a.i. and 23.a.ii (Transition Assistance)	Enrollees will be informed regarding how to access transition assistance in all communications and telephone assistance for plan assignment will be available in at least the 14 threshold languages.	<p>We recommend clarification of DHCS's role to state instead: "Enrollees will receive information from DHCS regarding how to access transition assistance in all communications. Telephone assistance for plan assignment will be available in at least the 14 threshold languages."</p>
5	STC 23.a.i. and 23.a.ii (Information Systems and County Collection of Data Elements)	Data Sources Required for Transition	We request clarification on the data that DHCS will seek from LIHPs to facilitate the seamless transition described in this plan. San Francisco appreciated the call that DHCS had with Alameda, San Mateo and Santa Clara counties about this topic several months ago and await clarification on the required data elements.
6	STC 23.a.i. and 23.a.ii (Data Transmission Responsibilities)	All data and IT processes will be completed on a schedule that supports pre-enrollment activities starting in July 2013.	We request clarification on the timeline, data transfer and IT processes. It is not clear to us what information is needed, and what IT processes will be used between July and December 2013.
6	STC 23.a.iii (Criteria for Provider Participation and Means of Securing Provider Agreements for the Transition)	DHCS will ensure available network capacity within plan networks; capacity will be based on the existing contractual standards in the MMCP contracts.	<p>We recommend instead: "DHCS will ensure available network capacity within plan networks; capacity will be based on the existing and/or future contractual standards in the MMCP contracts."</p>
7	STC 23.a.iv. (Schedule of implementation activities)	<p>January – June 2013</p> <p><input type="checkbox"/> General transition notification to LIHP enrollees begins</p>	We request clarification on the role expected of DHCS vs. LIHPs for the "general transition notification" and assume that the language for such notification would be provided by DHCS (in the threshold languages applicable in each LIHP County).